

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

GOOGLE LLC,

Case No. 2:22-cv-4182

Plaintiff

ANSWER

JURY TRIAL DEMANDED

v.

GVERIFIER TECHNOLOGIES LLC d/b/a
G VERIFIERS AND G VERIFIER PRO;
GVERIFIER SOFTECT SERVICES LLC
d/b/a G VERIFIERS AND G VERIFIER
PRO; SHRI HARI GOMARKETIN LLC
d/b/a GHYPER, GHYPERLOCAL, and G
VERIFICATIONS; INFINITY
GOMARKETIN LLC d/b/a GYPER,
GHYPERLOCAL, and G
VERIFICATIONS; AND does 1-25,

Defendants.

DEFENDANTS' ANSWER

Defendants, SHRI HARI GOMARKETIN LLC d/b/a GHYPER, GHYPERLOCAL, and G
VERIFICATIONS and GVERIFIER TECHNOLOGIES LLC d/b/a G VERIFIERS AND
VERIFIER PRO, GVERIFIER SOFTECT SERVICES LLC file this Answer to Plaintiff's
Complaint (hereafter referred to as (" Complaint ") :

Pursuant to Federal Rule of Civil Procedure 8(b), Defendants respond to the allegations in each corresponding paragraph of the Complaint as follows:

1.

SUMMARY

Defendants deny the allegations contained within the initial Summary of the Complaint.

1. Defendants admit paragraph one of the Complaint.
2. Defendants admit paragraph two of the Complaint.
3. Defendants admit paragraph three of the Complaint.
4. Defendants admit paragraph four of the Complaint.
5. Defendants admit paragraph five of the Complaint.
6. Defendants deny paragraph six of the Complaint.
7. Defendants deny paragraph seven of the Complaint.
8. Defendants admit paragraph eight of the Complaint.
9. Defendants admit paragraph nine of the Complaint.
10. Defendants admit paragraph ten of the Complaint.
11. Defendants admit paragraph eleven of the Complaint.
12. Defendants admit paragraph twelve of the Complaint.
13. Defendants admit paragraph thirteen of the Complaint.
14. Defendants admit paragraph fourteen of the Complaint.

15. Defendants admit paragraph fifteen of the Complaint.
16. Defendants admit paragraph sixteen of the Complaint.
17. Defendants admit paragraph seventeen of the Complaint.
18. Defendants admit paragraph eighteen of the Complaint.
19. Defendants admits paragraph nineteen of the Complaint.
20. Defendants admit paragraph twenty of the Complaint.
21. Defendants admit paragraph twenty-one of the Complaint.
22. Defendants admit paragraph twenty-two of the Complaint.
23. Defendants deny paragraph twenty-three of the Complaint.
24. Defendants deny paragraph twenty-four of the Complaint.
25. Defendants deny paragraph twenty-five of the Complaint.
26. Defendants deny paragraph twenty-six of the Complaint.
27. Defendants deny paragraph twenty-seven of the Complaint.
28. Defendants deny paragraph twenty-eight of the Complaint.
29. Defendants deny paragraph twenty-nine of the Complaint.
30. Defendants deny paragraph thirty of the Complaint.
31. Defendants deny paragraph thirty-one of the Complaint.

32. Defendants deny paragraph thirty-two of the Complaint.

33. Defendants deny paragraph thirty-three of the Complaint.

34. Defendants deny paragraph thirty-four of the Complaint.

35. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph thirty-five of the Complaint.

36. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph thirty-six of the Complaint.

37. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph thirty-seven of the Complaint.

38. Defendants deny paragraph thirty-eight of the Complaint.

39. Defendants deny paragraph thirty-nine of the Complaint.

40. Defendants deny paragraph forty of the Complaint.

41. Defendants deny paragraph forty-one of the Complaint.

42. Defendants deny paragraph forty-two of the Complaint.

43. Defendants deny paragraph forty-three of the Complaint.

44. Defendants deny paragraph forty-four of the Complaint.

45. Defendants deny paragraph forty-five of the Complaint.

46. Defendants deny paragraph forty-six of the Complaint.

47. Defendants deny paragraph forty-seven of the Complaint.

48. Defendants deny paragraph forty-eight of the Complaint.

49. Defendants deny paragraph forty-nine of the Complaint.

50. Defendants deny paragraph fifty of the Complaint.

51. Defendants deny paragraph fifty-one of the Complaint.

52. Defendants deny paragraph fifty-two of the Complaint.

53. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph fifty-three of the Complaint.

54. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph fifty-four of the Complaint.

55. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph fifty-five of the Complaint.

56. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph fifty-six of the Complaint.

57. Defendants admits the allegations in paragraph fifty-seven of the Complaint.

58. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph fifty-eight of the Complaint.

59. Defendants deny paragraph fifty-nine of the Complaint.

60. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph sixty of the Complaint.

61. Defendants deny paragraph sixty-one of the Complaint.

62. Defendants deny paragraph sixty-two of the Complaint.

63. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph sixty-three of the Complaint.
64. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph sixty-four of the Complaint.
65. The Defendants lack sufficient knowledge to admit or deny the allegations in paragraph sixty-five of the Complaint.
66. Defendants give the same answers by reference to all preceding paragraphs as if fully set forth.
67. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph sixty-seven of the Complaint.
68. Defendants deny paragraph sixty-eight of the Complaint.
69. Defendants deny paragraph sixty-nine of the Complaint.
70. Defendants admit paragraph seventy of the Complaint.
71. Defendants deny paragraph seventy-one of the Complaint.
72. Defendants deny paragraph seventy-two of the Complaint.
73. Defendants deny paragraph seventy-three of the Complaint.
74. Defendants deny paragraph seventy-four of the Complaint.
75. Defendants deny paragraph seventy-five of the Complaint.
76. Defendants re-allege and incorporate by reference all preceding answers to all preceding paragraphs.
77. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph seventy-seven of the Complaint.

78. Defendants deny paragraph seventy-eight of the Complaint.

79. Defendants deny paragraph seventy-nine of the Complaint.

80. Defendants deny paragraph eighty of the Complaint.

81. Defendants deny paragraph eighty-one of the Complaint.

82. Defendants deny paragraph eighty-two of the Complaint.

83. Defendants incorporates by reference answers to preceding paragraphs.

84. Defendants deny paragraph eighty-four of the Complaint.

85. Defendants admit paragraph eighty-five of the Complaint.

86. Defendants deny paragraph eighty-six of the Complaint.

87. Defendants deny paragraph eighty-seven of the Complaint.

88. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph eighty-eight of the Complaint.

89. Defendants deny paragraph eighty-nine of the Complaint.

90. Defendants deny paragraph ninety of the Complaint.

91. Defendants incorporate all preceding answers in all preceding paragraphs by reference.

92. Defendants deny paragraph ninety-two of the Complaint.

93. Defendants deny paragraph ninety-three of the Complaint.

94. Defendants deny paragraph ninety-four of the Complaint.

95. Defendants deny paragraph ninety-five of the Complaint.

96. Defendants incorporates by reference it answers to all preceding paragraphs.

97. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph ninety-seven of the Complaint.

98. Defendants deny paragraph ninety-eight of the Complaint.

99. Defendants deny paragraph ninety-nine of the Complaint.

100. Defendants deny paragraph one hundred of the Complaint.

101. Defendants deny paragraph one hundred and one of the Complaint.

102. Defendants deny paragraph one hundred and two of the Complaint.

103. Defendants deny paragraph one hundred and three of the Complaint.

104. Defendants deny paragraph one hundred and four of the Complaint.

105. Defendants incorporate by reference all answers to preceding paragraphs.

106. Defendants deny paragraph one hundred and six of the Complaint.

107. Defendants lack sufficient knowledge to admit or deny the allegations in paragraph one hundred and seven of the Complaint.

108. Defendants deny paragraph one hundred and eight of the Complaint.

109. Defendants deny paragraph one hundred and nine of the Complaint.

PRAYER

WHEREFORE, Defendants pray that their answer be deemed good and sufficient and all claims by Plaintiff against Defendants be dismissed, with prejudice, and such other and further relief, legal and equitable, including attorney's fees, be awarded Defendants.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38, Defendants hereby respectfully demand a trial by jury.

Dated May 3, 2023

Respectfully submitted,

/s/ Richard B. Parry

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Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of this ANSWER was duly served upon William G. Porter Esq., Karey E. Werner Esq., Whitty Somvichian Esq., Rebecca Givner-Forbes Esq. via ECF, this 3rd day of May, 2023.

/s/ Richard B. Parry

Richard B. Parry (0064777)